UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

LEMOND CYCLING, INC., Plaintiff, v. TREK BICYCLE CORPORATION, Defendant and Third-Party Plaintiff, v. GREG LEMOND, Third-Party Defendant.	Case No. 08-CV-1010 (RHK-JSM)

AFFIDAVIT OF DAN TITUS

STATE OF WISCONSIN)
) ss.
COUNTY OF JEFFERSON)

Dan Titus, being first duly sworn under oath, deposes and states as follows:

1. I am an adult resident of the State of Wisconsin and am Midwest Regional Sales Manager for Trek Bicycle Corporation. I make this affidavit on personal knowledge.

2. As part of my duties at Trek, I interact daily with Independent Bicycle Dealers who carry products distributed by Trek, including the LeMond products until 2008. IBDs typically sell multiple categories of bikes (mountain, road, comfort, etc.) along with multiple brands within each category. This enables the IBD consumer to

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comparison shop without going to a competitor's store, increasing the IBD's chance of making a sale.

3. I discuss with dealers all facets of their business. I also receive information from those Trek employees who report to me and who, as part of Trek's normal course of business, often forward to me comments from dealers.

4. Dealer satisfaction is extremely important to Trek as Trek depends on its dealers for the sale and distribution of Trek products. It is important for Trek to get feedback from its dealers, including dealers' insights into their customers' attitudes and preferences, in order for Trek to help make the dealers successful and, in turn, make Trek successful.

5. I have had numerous conversations with dealers who were upset by Greg LeMond's comments regarding Lance Armstrong and other athletes. Many of these dealers had made significant investments in the LeMond brand by purchasing inventory, educating themselves and their employees about the products, and promoting the LeMond name. As a result of the comments, many of the dealers with whom I dealt were less enthusiastic about and committed to the LeMond line, which resulted in lost sales by Trek to these dealers.

6. Maintaining goodwill for and a high reputation of the Trek brands, including the LeMond brand when it was part of the Trek brands, is critical to Trek's business. Positive customer relations is essential to the success of any brand for both Trek and its dealers because it is difficult for dealers to sell products to consumers who have a negative impression of a brand. Thus, Trek considers dealer and customer feedback in its business decisions.

7. Attached to this Affidavit as Exhibit A (TREK000603-08; TREK000611-12; TREK000614; TREK000616-19; TREK000566) are complete and accurate copies of emails that I received from Trek employees discussing or forwarding comments from dealers in the 2004 and 2006 timeframe responding to Greg LeMond's actions. I have had numerous conversations of the same character with dealers each time Greg LeMond made comments during the 2004 to 2008 timeframe.

8. Attached to this Affidavit as Exhibit B (TREK000609) is a complete and accurate copy of an email I received from a Trek employee forwarding an Internet posting.

9. Also attached to this Affidavit as Exhibit C (TREK011479-80) is a complete and accurate copy of an email chain between me and dealer, Kevin Ishaug of Freewheel Bike in Minneapolis, near where Greg LeMond lives. Mr. Ishaug was especially disappointed because while Mr. Ishaug had been supporting the LeMond brand, Mr. LeMond personally caused Mr. Ishaug's bike shop to lose sales as result of Greg LeMond's abuse of Trek's employee purchase program.

/s/ Daniel Titus ___________________
Dan Titus

Subscribed and sworn to before me
this _4th__ day of August, 2009.

/s/ Lisa Smith ___________________
Notary Public, State of Wisconsin
My Commission expires: 10/17/2010